

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

LAWRENCE HARTFORD, et al.,

Plaintiffs,

v.

BOB FERGUSON, in his official capacity as
Washington State Attorney General, et al.,

Defendants.

NO. 3:23-cv-05364-RJB

DECLARATION OF VICTORIA
JOHNSON IN SUPPORT OF STATE
DEFENDANTS' MOTION TO COMPEL
THIRD-PARTY WILLIAM ENGLISH TO
COMPLY WITH SUBPOENA

NOTE ON MOTION CALENDAR:
JANUARY 26, 2024

I, Victoria Johnson, declare as follows:

1. I am over the age of 18, competent to testify as to the matters in my declaration, and make this declaration based on my personal knowledge.

2. I am a Paralegal in the Complex Litigation Division of the Office of the Attorney General (AGO) in Tumwater, Washington.

3. On November 6, 2023, I sent a subpoena for information from William English to the process server Pacific Northwest Legal Support (PNLS) with direction to serve Mr. English at his office at Georgetown University, which is listed as a contact address on his website. That website is <https://williamenglish1.wixsite.com/williamenglish> and the address listed is 307 Hariri, 3700 O St., NW, Washington, DC 20057. PNLS attempted to serve Mr. English on November 8, 2023. A true and correct copy of that email is attached hereto as

1 **Exhibit A.**

2 4. On November 9, 2023, PNLS informed me that the process server attempted to
 3 serve Mr. English at his Georgetown location but was not successful. The process server called
 4 Mr. English and got no answer, was directed to Mr. English's office but was not able to find
 5 Mr. English either at his office or any of his classrooms. I requested the process server to
 6 reattempt service at his Georgetown office until we were able to find a home address for
 7 Mr. English. On November 13, 2023, the process server again attempted to serve Mr. English at
 8 his Georgetown office but was again unable to locate Mr. English at either his office or the room
 9 where his class schedule indicated he would be teaching. A true and correct copy of this email
 10 correspondence is attached hereto as **Exhibit A.**

11 5. On November 14, 2023, I sent instructions to PNLS to attempt service at
 12 Mr. English's home address in Chevy Chase, Maryland. A true and correct copy of this email is
 13 attached hereto as **Exhibit B.**

14 6. On November 27, 2023, PNLS informed me that service on Mr. English at
 15 Georgetown was again unsuccessful and that service at Mr. English's home was also
 16 unsuccessful. The process server reported that, at his home address, there were a few cars in the
 17 driveway and female who was inside but who looked at the door and refused to answer the door.
 18 *See Exhibit A.*

19 7. On December 1, 2023, I caused a copy of the subpoena to be sent via Certified
 20 Mail to Mr. English to both his home address and his Georgetown office. The Certified Mail
 21 sent to his home address was returned to our office on December 27, 2023, designated as
 22 "Addressee Unknown." A true and correct copy of the USPS Tracking page is attached hereto
 23 as **Exhibit C.** The Certified Mail sent to his Georgetown office is still in transit, as of the date
 24 of this declaration. A true and correct copy of the USPS Tracking page is attached as **Exhibit D.**

25 8. On December 12, 2023, I sent the subpoena to Mr. English via FedEx with
 26 signature delivery to his home address and to his Georgetown office. On December 13, 2023, I

1 received notification that Mr. English signed for the FedEx delivery at his home address
2 containing the subpoena at 12:33 p.m. EST. A true and correct copy of the delivery confirmation
3 from FedEx is attached hereto as **Exhibit E**. That same day, a B. Welch signed for the delivery
4 to his Georgetown office at 10:41 a.m. EST. A true and correct copy of the delivery confirmation
5 from FedEx is attached hereto as **Exhibit F**.

6 I declare under the penalty of perjury of the laws of the State of Washington and the
7 United States of America that the foregoing is true and correct.

8 DATED this 11th day of January 2024 at Kelso, Washington.

9
10 *Victoria Johnson*
VICTORIA JOHNSON
11 Paralegal
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